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Sent via ECF

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Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *The Center for Investigative Reporting v. OpenAI Inc., et al.*, No. 1:24-cv-4872

Dear Judge Wang:

We write to provide an update as to the status of the outstanding disputes raised at the Status Conference on September 12, 2024 in accordance with the Court's subsequent Order on September 13, 2024 (ECF No. 85). OpenAI has leave of both Plaintiff and Microsoft to file this letter jointly on behalf of all parties to this action.

The parties have scheduled their Rule 26(f) conference and will file their Rule 26(f) report by the October 16, 2024 deadline. The parties will be prepared to discuss scheduling and other Rule 26 and Rule 16 issues at the October 30, 2024 status hearing, which the Court has also set as a Rule 16 conference for this case. Plaintiff filed its amended complaint on September 24, 2024. The Court has entered the parties' requested order setting Defendants' response to the amended complaint as October 15, 2024, and if that response is a motion to dismiss, a briefing schedule that concludes November 19, 2024.

Respectfully submitted,

/s/ Joseph C. Gratz
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